

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

EMPIRE HOLDINGS GROUP LLC, also d/b/a
ECOMMERCE EMPIRE BUILDERS and
STOREFUNNELS.NET, a limited liability
company, and

PETER PRUSINOWSKI, aka PETER PRU,
individually and as an officer of Empire Holdings
Group LLC,

Defendants.

Case No. 2:24-CV-4949

**JOINT MOTION FOR ENTRY OF
STIPULATED PRELIMINARY INJUNCTION**

Plaintiff Federal Trade Commission (“FTC” or “Plaintiff”) and Defendants Empire Holding Group LLC d/b/a Ecommerce Empire Builders and storefunnels.net (“EEB”) and Peter Prusinowski (“Prusinowski” collectively “Defendants”) (Plaintiff and Defendants each, individually, a “Party,” and collectively, the “Parties”), by counsel, jointly move this Court to enter the attached Proposed Stipulated Preliminary Injunction. Today, November 7, 2024, the Parties reached an agreement to stipulate to a preliminary injunction. The Proposed Preliminary Injunction is attached to this motion, and has been signed by counsel for all parties.

Therefore, the parties respectfully request the Court’s approval of the proposed stipulated preliminary injunction.

Dated: November 7, 2024

/s/ Amanda Grier

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Respectfully Submitted,

/s/ Greg Christiansen

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Counsel for Defendants
Empire Holdings Group LLC and
Peter Prusinowski

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2024, I caused a copy of the foregoing Consent Motion For Entry of Stipulated Preliminary Injunction and Memorandum In Support to be served on all counsel of record by Operation of the Court's electronic filing system.

/s/Amanda Grier
Amanda Grier